



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

Mountain  
Plains  
Region

1244 Speer Boulevard, Suite 903  
Denver, Colorado 80204-3585

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Reply to  
Attn of: SP-05-05

Subject: Questions and Answers on School Meals Initiative

To: STATE AGENCY DIRECTORS – Colorado ED, Iowa, Kansas, Missouri ED, Montana OPI,  
(Special Nutrition Programs) Nebraska, North Dakota, South Dakota, Utah and Wyoming

*Attached are answers to questions that arose during the School Meals Initiative (SMI) training session at the Mountain Plains Region Biennial State Agency Meeting in Cheyenne, Wyoming, October 2004.*

If there are any questions please contact Gina O'Brian of my staff at (303) 844-0354.

  
DARLENE SANCHEZ  
Regional Director  
Special Nutrition Programs

Attachment

**School Meals Programs**  
**School Meals Initiative (SMI) Questions and Answers**  
**From MPR Biennial State Agency Meeting, Cheyenne, Wyoming, 2004**

**Q:** If a school is no longer “improving” toward decreasing cholesterol or sodium, or increasing fiber, must they be written up? When have they “arrived” at an acceptable level if the State Agency (SA) chooses not to set a level? What if within one school district you are now comparing a high school (and high schools are usually higher in sodium and cholesterol) to an elementary school that was reviewed previously, is it fair to say they are getting worse as a school district in this case?

**A:** On page 65 of SMI Guidance, “Nutrient Analysis Protocols” it indicates that cholesterol, sodium or fiber levels can be compared to previous levels and State or National Guidelines. Page 70 of the same resource has a table of National Guidelines to use when a SA has not set their own level. Guidance from SMI trainings has been to continue to encourage improvement when levels fall short of the State or National Guidelines. Although, USDA does not require SAs to set levels for cholesterol, sodium or fiber; the Mountain Plains Regional Office encourages states to do so with the understanding that states have the discretion to set levels or can opt not to do so and may instead chose to benchmark to determine progress.

When reviewing a school’s cholesterol, sodium or fiber levels as “compared to previous levels,” previous levels would be “previous levels at the same school or school in the district using the same menu and portion sizes” so a high school would unlikely be compared to previous analysis at an elementary school.

**Q:** When are follow-up reviews required? Although breakfast may typically be reviewed during a follow-up review, is reviewing breakfast ever required?

**A:** Page 56 of SMI Guidance, “Nutrient Analysis Protocols” indicates that it is an option to combine breakfast and lunch in an analysis only when using Nutrient Standard Menu Planning (NSMP) and weighted averaging. Page 28 of “A Reviewers Guide to SMI” indicates that follow-up visits are optional at the State’s discretion.

Federal Regulations, Part 210.19(a)(1) says, “Compliance with nutrition standards. (i) Beginning with School Year 1996-1997, State agencies shall evaluate compliance, over the school week, with the nutrition standards for lunches and, as applicable, for breakfasts. Review activity may be confined to lunches served under the Program unless a menu planning approach is used exclusively in the School Breakfast Program or unless the school food authority only offers breakfasts under the School Breakfast Program.”

Federal Regulations, Part 210.19(a)(1)(i)(C) goes on to say, "In addition, State agencies are encouraged to review breakfasts offered under the School Breakfast Program as well if the school food authority requires technical assistance from the State agency to meet the nutrition standards or if corrective action is needed. Such review...may be done at the time of the initial review or as part of a follow-up..."

Therefore, unless a menu planning approach is used exclusively in the School Breakfast Program or unless the school only offers breakfast, analyzing breakfast can be considered during a review and is encouraged but not required during a follow-up review.

**Q:** If only one school in a district offers an alternate menu choice, could you just weigh in that alternate entrée rather than do an extra analysis?

**A:** Based on the description of weighted averaging (page 58-61 of "Nutrient Analysis Protocols") the alternate entrée choice would just be weighted in to the analysis at that school or an overall analysis if for the whole district.